

FILED

APR 17 1996

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Telecommunications Services Inside Wiring) CS Docket No. 95-184
)
Customer Premises Equipment)

**REPLY COMMENTS OF DOCKET FILE COPY ORIGINAL
BUILDING INDUSTRY CONSULTING
SERVICE INTERNATIONAL**

Building Industry Consulting Service International ("BICSI") hereby replies to the comments of others in the above-captioned proceeding. In its Comments of March 18, 1996, BICSI noted that cable and telephone service demarcation points -- separating customer premise wire from service provider facilities -- had tended in practice to merge at a point slightly exterior to the outer wall of single-unit dwellings, even though for telephone purposes an interior separation point was permissible. For multiple dwelling-unit or office buildings, BICSI suggested that

a common demarcation point inside the building
would provide the interface most economically,
especially considering any termination equipment
required by new technologies. (Comments, 2)

The record surely supports uniform demarcation for single homes and, by a smaller margin, for multiple dwelling-unit and office buildings as well. There were frequent comments aligned with BICSI's belief that the most effective way to move toward commonality of demarcation in multiple-unit buildings "is not through additional FCC regulation but

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rather through the workings of marketplace forces and industry-sponsored standards.” (Comments, 3)

BICSI agrees with the Building Owners and Managers Association (“BOMA”) that owners need to be able to manage and control the activities of the various parties who install and maintain telecommunications facilities within buildings. However, in its consideration of the issues raised by BOMA and other commenters, the Commission must not forget end-user customers -- who ultimately pay the bills and upon whom the entire industry should be focused.

Liberty Cable suggests that states consider adopting “building codes that require MDU owners to install conduits, wires and/or antenna sites to facilitate multiple MVPD access to residents.” (Comments, 21) BICSI agrees that proper design and installation of conduits and other pathway support structures would alleviate many of the problems of multiple-provider access to tenants. However, rather than interject mandatory codes or regulations, which only delay and burden the process, BICSI believes a preferable alternative is for the FCC to encourage standards-writing bodies to incorporate consideration of multiple-provider access in their recommended infrastructure design parameters.

Respectfully submitted,

BUILDING INDUSTRY CONSULTING
SERVICE INTERNATIONAL

By 

John Gage
President, BICSI
10300 University Center Drive
Suite 100
Tampa, Florida 33612

James R. Hobson
Donelan, Cleary, Wood & Maser, P.C.
1100 New York Avenue, N.W., #750
Washington, D.C. 20005-3934
(202) 371-9500

April 17, 1996

ITS ATTORNEY

CERTIFICATE OF SERVICE

I hereby certify that I have caused to be delivered on this 17th day of April, 1996, by hand-delivery or by first class-mail, postage prepaid, copies of the foregoing REPLY COMMENTS OF BUILDING INDUSTRY CONSULTING SERVICE INTERNATIONAL to the following and to all parties of record in this proceeding.

MEREDITH JONES
Chief, Cable Services Bureau
Room 918
Federal Communications Commission
2033 M Street, N.W.
Washington, D.C. 20554

- BY HAND

WILLIAM VON ALVEN
Common Carrier Bureau
Room 6106
Federal Communications Commission
2025 M Street, N.W.
Washington, D.C. 20554

- BY HAND

MARY MCDERMOTT
Vice President & General Counsel
U.S. Telephone Association
1401 H Street, N.W.
Suite 600
Washington, D.C. 20005

PHILLIP MINK
Citizens for a Sound Economy Foundation
1250 H Street, N.W.
7th Floor
Washington, D.C. 20005


Jacqueline A. Spence